

EXHIBIT 10

TWANA AHMED,	:	
	:	
Plaintiff,	:	Case No. 4:23-cv-02823
	:	
v.	:	Hon. Judge Lee H. Rosenthal
	:	
UNIVERSAL PROTECTION SERVICE,	:	
LP d/b/a ALLIED UNIVERSAL	:	
SECURITY SERVICES,	:	
	:	
Defendant.	:	
	:	

I, Patrick Freeney, pursuant to 28 U.S.C. § 1746, state as follows:

1. I am Black male, over the age of 18, have knowledge of the matters set forth herein, and could testify competently to them if called as a witness. I am a 20-year veteran of the U.S. Army Military Police, previously deployed to Iraq, and retired from service in 2014 as a Staff Sergeant.

2. I was employed by Universal Protection Service, LP d/b/a Allied Universal Security Services (“Allied Universal”) as the Client Manager for the H-E-B account based in the Houston branch office from October 29, 2021, through June 18, 2022, when I voluntarily resigned. During my employment, I was never disciplined or otherwise reprimanded.

3. I have specific knowledge of Allied Universal's policies concerning the prevention of harassment, discrimination, and retaliation. I am familiar with the various reporting methods available to all employees including the employee hotline. I reported all known, perceived, or otherwise identified complaints of unfair or alleged unlawful conduct.

4. I am also knowledgeable and familiar with Allied Universal's personal appearance and grooming standards. Employees are permitted to wear facial hair, including beards that are neat and trimmed. Allied Universal provides medical and religious accommodations to this policy. I consistently wore facial hair without any accommodation, and at no point during my employment was I asked to shave it.

5. Due to my position as the Client Manager, I had regular opportunities to observe Twana Ahmed while he was employed, and he consistently wore a beard. I never requested that he shave his beard, nor did he mention anything about his religion or indicate that he practiced any specific religion during that time.

6. On April 4, 2022, I learned that Mr. Ahmed used force to detain an alleged shoplifter at a H-E-B site location. While onsite at the H-E-B store, Field Supervisor Alexzander Bergeron informed me of his observations and what he learned from Mr. Ahmed, the H-E-B store manager, and responding Belaire police officers. Consistent with Allied Universal's discipline procedures, Mr. Ahmed was suspended pending investigation.

7. I completed all notice and reporting requirements including the submission of a Use of Force ("UOF") Incident Report to James Grant, Director of Weapons & Use of Force Policy. As per the UOF Policy, I assembled a panel including then Branch Manager Felicia Solis-Ramirez, Senior Regional Vice President Kareen McKinnon, and then Regional Vice President Bill King to review the April 4, 2022 incident involving Mr. Ahmed. At no point did Mr. Ahmed inform me, or the panel, of any alleged threat made by the subject or that he was allegedly armed with any type of weapon.

8. On or about April 7, 2022, the panel completed its investigation and determined that the force used by Mr. Ahmed on April 4, 2022, was unjustified. Mr. Ahmed was subsequently terminated for violation of the UOF Policy.

9. I reviewed Mr. Ahmed's Complaint filed in this lawsuit, specifically including Paragraphs 50, 57, and 58. I deny that any conversations containing such language or content were ever had with Mr. Ahmed. Additionally, I have never used, nor would I use, such language in speaking with or to Mr. Ahmed or about another person, particularly as a Black man.

10. While Mr. Ahmed was employed with Allied Universal, I was not made aware of, nor did he ever mention to me, his race, ancestry, ethnicity, or national origin. I never knew, nor did he mention that he is of Kurdish descent.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 and under the laws of the United States of America, that the foregoing is true and correct, except as to matters stated to be based on information and belief.

FURTHER DECLARANT SAYETH NOT.

Executed on November ^{13.00}_____, 2024.

DocuSigned by:



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Patrick Freney